

# EXHIBIT D

**From:** [Baldridge, J. Douglas](#)  
**To:** [Nathan, Aaron E.](#); [Morrone, Katherine Wright](#); [Theresa Troupson](#); [Cortni Davis](#); [Christina Puello](#); [Bryan Freedman](#); [Jason Sunshine](#); [Summer Benson](#); [mitra@ahouraianlaw.com](#); [Local KAF. Counsel](#); [Local MS. Counsel](#); [sma@msf-law.com](#); [Ellyn Garofalo](#); [Amir Kaltgrad](#); [Gottlieb, Michael](#); [Governski, Meryl Conant](#); [Hudson, Esra](#); [Bruno, Matthew](#); [Roeser, Stephanie](#); [katebolger@dwt.com](#); [samcategumpert@dwt.com](#)  
**Cc:** [Webb, G. Stewart Jr.](#)  
**Subject:** RE: Case No. 1:25-mc-00060 - Motion to Quash Subpoena  
**Date:** Thursday, May 22, 2025 10:58:53 AM

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Counsel – Please be advised that the Venable Subpoena and the Taylor Swift Subpoena have been withdrawn by counsel for the Wayfarer Parties without prejudice to them timely serving subpoenas in the future should they decide to do so (all parties reserving all rights). No documents are being produced and no deposition is being scheduled. Accordingly, we will be notifying the Court that our motion to quash is moot. Thank you. Doug.

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**From:** Nathan, Aaron E. <ANathan@willkie.com>  
**Sent:** Monday, May 12, 2025 6:49 PM  
**To:** Morrone, Katherine Wright <KWMorrone@venable.com>; Theresa Troupson <ttroupson@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Christina Puello <cpuello@lftcllp.com>; Bryan Freedman <bfreedman@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Summer Benson <sbenson@lftcllp.com>; mitra@ahouraianlaw.com; Local KAF. Counsel <kaf@msf-law.com>; Local MS. Counsel <ms@msf-law.com>; sma@msf-law.com; Ellyn Garofalo <egarofalo@lftcllp.com>; Amir Kaltgrad <akaltgrad@lftcllp.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; ehudson@manatt.com; mbruno@manatt.com; sroeser@manatt.com; katebolger@dwt.com; samcategumpert@dwt.com  
**Cc:** Baldridge, J. Douglas <JBaldridge@Venable.com>; Webb, G. Stewart Jr. <gswebb@Venable.com>  
**Subject:** RE: Case No. 1:25-mc-00060 - Motion to Quash Subpoena

**Caution: External Email**

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Dear Counsel,

As you are aware, we were just served with a copy of Venable LLP's motion to quash filed in the above-captioned matter, relating to a subpoena issued in connection with *Lively v. Wayfarer Studios*

LLC, Nos. 24-cv-10049 and 25-cv-449 (S.D.N.Y.). On behalf of Blake Lively and Ryan Reynolds, we intend to file a motion to intervene in the above-captioned matter prior to tomorrow's deadline for subpoena compliance, along with a motion to quash.

Please let us know by the end of the day today of your position on our motion to intervene.

Thanks,

**Aaron E. Nathan**  
**Willkie Farr & Gallagher LLP**  
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**From:** Morrone, Katherine Wright <[KWMorrone@venable.com](mailto:KWMorrone@venable.com)>  
**Sent:** Monday, May 12, 2025 4:02 PM  
**To:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Local KAF. Counsel <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Local MS. Counsel <[ms@msf-law.com](mailto:ms@msf-law.com)>; [sma@msf-law.com](mailto:sma@msf-law.com); Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Amir Kaltgrad <[akaltgrad@lftcllp.com](mailto:akaltgrad@lftcllp.com)>; Gottlieb, Michael <[MGottlieb@willkie.com](mailto:MGottlieb@willkie.com)>; Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>; [ehudson@manatt.com](mailto:ehudson@manatt.com); [mbruno@manatt.com](mailto:mbruno@manatt.com); [sroeser@manatt.com](mailto:sroeser@manatt.com); [katebolger@dwt.com](mailto:katebolger@dwt.com); [samcategumpert@dwt.com](mailto:samcategumpert@dwt.com)  
**Cc:** Baldridge, J. Douglas <[JBaldridge@Venable.com](mailto:JBaldridge@Venable.com)>; Webb, G. Stewart Jr. <[gswebb@Venable.com](mailto:gswebb@Venable.com)>  
**Subject:** Case No. 1:25-mc-00060 - Motion to Quash Subpoena

\*\*\* EXTERNAL EMAIL \*\*\*

Counsel,

Today, Venable LLP filed the attached Motion to Quash the April 28, 2025 Subpoena in the U.S. District Court for the District of Columbia. The Motion and other ancillary documents that were filed today are included at the following ShareFile link:

<https://venable.sharefile.com/d-s6db417e3eab6453e90fc0d11c0110b2a>

Additionally, attached please find Responses & Objections to the April 28, 2025 Subpoena to Venable LLP.

Best,  
Katie

Katie Wright Morrone, Esq. | Venable LLP

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